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6 Attorney for Carlos Delgado-Macias  
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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 CARLOS DELGADO-MACIAS,  
15 Defendant.

Case No. 2:19-cr-00256-GMN-BNW

**UNOPPOSED MOTION FOR THE  
PREPARATION OF PRE-PLEA  
PRESENTENCE REPORT (PSR)**

16 The defendant, Carlos Delgado-Macias, by and through his counsel of record, Rene L.  
17 Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public Defender,  
18 files this Unopposed Motion for the Preparation of Pre-Plea Presentence Report. This pleading  
19 is based upon the attached Memorandum of Points and Authorities and all of the papers and  
20 pleadings on file herein.

21 DATED this 3<sup>rd</sup> day of April 2020.

22  
23 RENE L. VALLADARES  
Federal Public Defender

24 By: /s/Monique Kirtley

25 MONIQUE KIRTLEY  
Assistant Federal Public Defender  
26 Attorney for Carlos Delgado-Macias

1 **MEMORANDUM POINTS AND AUTHORITIES**

2 On October 08, 2019, Mr. Delgado-Macias was charged in a one-count criminal  
3 Indictment with Deported Alien Found in the United States in violation of 8 U.S.C. § 1326.  
4 ECF No. 1. The parties have entered into a plea agreement in which Mr. Delgado-Macias will  
5 plead guilty to the one-count Indictment, and the parties are recommending a sentence of twelve  
6 months and one day.

7 In light of the plea agreement, the parties will be filing a stipulation requesting that the  
8 change of plea and sentencing hearing be held together and scheduled on the same date and  
9 time as the Calendar Call. The defendant is currently scheduled for a calendar call date on July  
10 7, 2020, at 9:00 am.

11 Should this Court grant the parties' stipulation, there will be a need for the presentence  
12 investigation report to be ordered and completed before the change of plea and sentencing  
13 hearings. As a result, Mr. Delgado-Macias requests this Court order the preparation of a pre-  
14 plea presentence investigation report. Undersigned counsel has spoken with AUSA Kimberly  
15 Frayn, and she does not oppose this motion.

16 DATED this 3<sup>rd</sup> day of April 2020.

17 Respectfully submitted,  
18 RENE L. VALLADARES  
19 Federal Public Defender

20 By: /s/ Monique Kirtley

21 MONIQUE KIRTLEY  
22 Assistant Federal Public Defender  
23 Attorney for Carlos Delgado-Macias

24 **IT IS SO ORDERED.**

25 Dated this 6 day of April, 2020.

26   
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

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That on April 3, 2020, he served an electronic copy of the above and foregoing

**REPORT (PSR** by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH  
United States Attorney  
KIMBERLY M. FRAYN  
Assistant United States Attorney  
501 Las Vegas Blvd. So  
Suite 1100  
Las Vegas, NV 89101

/s/ *Brandon Thomas*  
Employee of the Federal Public Defender